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Attorneys for Defendant THOMAS DUNDON

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

COLTON SCHMIDT, individually and on  
behalf of others similarly situated; REGGIE  
NORTHRUP, individually and on behalf of  
others similarly situated,

Plaintiffs,

v.

AAF PLAYERS, LLC, a Delaware Limited  
Liability Company, d/b/a/ The Alliance of  
American Football; THOMAS DUNDON, an  
individual; CHARLES "CHARLIE"  
EBERSOL, an individual; LEGENDARY  
FIELD EXHIBITIONS, LLC, a Delaware  
Limited Liability Company; AAF  
PROPERTIES, LLC, a Delaware Limited  
Liability Company; EBERSOL SPORTS  
MEDIA GROUP, INC., a Delaware  
Corporation; and DOES 1 through 200,  
inclusive,

Defendants.

Case No. 3:19-cv-3666

[San Francisco County Superior Court Case  
No. CGC-19-575169]

**DECLARATION OF THOMAS DUNDON  
IN SUPPORT OF DEFENDANT'S  
NOTICE OF REMOVAL OF CIVIL  
ACTION UNDER 28 U.S.C. §§ 1332, 1441,  
1446, 1453, AND 1711**

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**DECLARATION OF THOMAS DUNDON**

I, Thomas Dundon, declare as follows:

1. I am over 18 years of age, of sound mind, capable of making this declaration, and have personal knowledge of the facts stated herein. I have never been convicted of a crime involving moral turpitude. If called as a witness I could and would testify competently thereto.

2. I am a resident of the County of Dallas in the State of Texas and have been continuously since the late 1990s. I have been a resident of the State of Texas for over 30 years.

3. I have never been a resident of the State of California.

4. I do not own or lease real property in California.

5. I have never maintained a drivers' license or state identification card in the State of California.

6. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury the foregoing is true and correct.

I executed this declaration in Dallas, Texas, on June 24, 2019.

By: 

THOMAS DUNDON

**PROOF OF SERVICE**

***Colton Schmidt, etc., et al. v. AAF Players, LLC, etc., et al.***  
**United States District Court, Northern District Case No. 3:19-cv-3666**

**STATE OF CALIFORNIA, COUNTY OF ORANGE**

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Orange, State of California. My business address is Jamboree Center, 4 Park Plaza, Suite 1100, Irvine, CA 92614.

On June 24, 2019, I served true copies of the following document(s) described as **DECLARATION OF THOMAS DUNDON IN SUPPORT OF DEFENDANT'S PETITION AND NOTICE OF REMOVAL OF CIVIL ACTION UNDER 28 U.S.C., §§ 1332, 1441, 1446, 1543, 1711, ET SEQ.; AND 28 U.S.C. §§ 1334, 1452** on the interested parties in this action as follows:

Boris Treyzon, Esq.  
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Attorneys for Plaintiff STEVE  
ENRIQUEZ

**BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the address listed above and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Payne & Fears LLP's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on June 24, 2019, at Irvine, California.

/s/ Terri M. Shaw  
Terri M. Shaw

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